<center>REMARKS</center>

The claims remaining in the present application are Claims 1-23.

Claims 1-3, 5,7, 10, and 16-17 have been amended. No new matter has been

added as a result of claim amendments.

<center>CLAIM REJECTIONS</center>

<center>35 U.S.C. §112</center>

Claims 1-23 are rejected under 35 U.S.C. §112, ¶1, written description.

Applicants have amended the claims to remove the objected to "un-weighted

average." Therefore, this rejection is rendered moot.

Claims 1-9 are rejected under 35 U.S.C. §112, ¶2. Applicants have

amended claim language from "pixel area" to "sub-pixel." Applicants

respectfully assert that the amended claim language complies with 35 U.S.C.

§112, ¶2. Applicants have removed the limitations "based on an unweighted

average of said first color for all pixels in said region of said image."

Therefore, Applicants respectfully assert that the rejection with respect to

"based on an unweighted average of said first color for all pixels in said

region of said image" is rendered moot.

<center>35 U.S.C. §102</center>

Claims 1-23 are rejected under 35 U.S.C. §102 as being anticipated

by Szeliski et al., U.S. Pat. No. 6,009,190 (hereinafter, Szeliski). The

rejection is respectfully traversed for the following reasons.

Currently amended Independent Claim 1 recites:

A method of processing an image for display, said method comprising:

mapping a sub-pixel of a display to a region of said image, said sub-pixel operable to display a first color of a plurality of colors;

based on intensity of said first color in said region of said image, calculating an intensity value for said first color to be displayed in said sub-pixel of said display, wherein said region comprises an intensity value for each of said plurality of colors; and

repeating the mapping and calculating for additional sub-pixels of said display corresponding to additional regions of said image, mapping each sub-pixel to its own region, wherein said image is processed.

Applicants have claimed a method that involves rendering at the sub-pixel level of a display. Claim 1 recites that sub-pixels of a display are mapped to regions of an image. Claim 1 recites that each sub-pixel is mapped to its own region. Thus, a mapping is created between regions of the image and each of the sub-pixels of the display, wherein each sub-pixel is mapped to its own region. Thus, no two-sub-pixels of the display map to the same region of the image.

Applicants respectfully assert that Szeliski is silent as to rendering at the sub-pixel level of a display. That is, to Applicant's understanding Szeliski does not teach or suggest that the regions of an image are mapped to sub-pixels. Szeliski may teach that an image may be displayed on an image display. For example, at col. 9, lines 30-34 Szeliski teaches that a conventional graphics engine may be used to display texture maps that are stored in a texture map memory on a display. However, what is

missing from this teaching, at a minimum, is the claimed mapping in which no two-sub-pixels of the display map to the same region of the image. Therefore, Applicants respectfully request allowance of Claim 1.

Claim 10 recites in part:

> said sub-pixel corresponding to said region of said image based on a pre-determined mapping, said pre-determined mapping providing a unique region of said image for said sub-pixel, wherein said display comprises a plurality of colors

For reasons discussed in the response to Claim 1, Applicant respectfully asserts that Szeliski fails to teach or suggest the claimed limitations of, "pre-determined mapping providing a unique region of said image for said sub-pixel." Therefore, Applicants respectfully request allowance of Claim 10.

Claim 16 recites in part:

> for each sub-pixel, calculating an intensity value for said sub-pixel using only intensity information for a first color from said corresponding.

In accordance with the embodiment of Claim 16, only intensity information for a first color is used in calculating an intensity value for said sub-pixel. Applicant respectfully asserts that Szeliski fails to teach or suggest this limitation. As Applicant has previously noted, Szeliski is not concerned with sub-pixel rendering. Moreover, Szeliski does not use only intensity information for a first color from said corresponding region. Therefore, Applicants respectfully request allowance of Claim 16.

Claims 2-9, 11-15, and 17-23 depend from Claims 1, 10, and 16, which are respectfully believed to be allowable for reasons discussed herein. Therefore Claims 2-9, 11-15, and 17-23 are believed to be allowable by virtue of their dependencies.

Meaning of "Color"

Applicant respectfully asserts the term "color" has definitions which may be broader in meaning than the definition that the Examiner has stated. Applicant notes that Merriam-Webster's Collegiate Dictionary provides many meanings for the word color. Applicant respectfully asserts that the Applicant is entitled to <u>ALL</u> meanings that the Applicant has not <u>expressly disclaimed</u>. Applicant has not and does not expressly disclaim any meaning of the term "color." Therefore, Applicant respectfully asserts that the meaning of the word "color" is not to be limited to the definition provided by the Examiner. Applicant notes that it does not appear that the Examiner intended to unfairly restrict the meaning of the term "color."

Applicant respectfully asserts that the term "color" is defined in Merriam-Webster's Collegiate Dictionary as: 1 a) phenomenon of light (as red, brown, pink, or gray) or visual perception that enables one to differentiate otherwise identical objects b : the aspect of objects and light sources that may be described in terms of hue, lightness, and saturation for objects and hue, brightness, and saturation for light sources c : a hue as contrasted with black, white, or gray.

Applicant notes that definition 1a provides "gray" as an example. Moreover, the definition of "phenomenon of light or visual perception that enables one to differentiate otherwise identical objects," is certainly broad enough to include black, white, and gray as those "colors" would "enable one to differentiate otherwise identical objects." Applicant further notes that definition in 1b Merriam-Webster's Collegiate Dictionary states that color is defined as the aspect of objects and light sources that may be described in terms of hue, lightness, and saturation for objects and hue, brightness, and saturation for light sources. Thus, the term color is not limited to hue by this definition in Merriam-Webster's Collegiate Dictionary, as color may also include lightness, brightness, and saturation.

Nothing in Applicant's response is to be interpreted as an express or implied disclaiming of any meaning of the term "color," whether the meaning is discussed or not discussed herein.
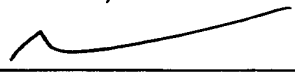
CONCLUSION

In light of the above listed amendments and remarks, reconsideration of the rejected claims is requested. Based on the arguments and amendments presented above, it is respectfully submitted that Claims 1-23 overcome the rejections of record. Therefore, allowance of Claims 1-23 is respectfully solicited.

Should the Examiner have a question regarding the instant amendment and response, the Applicants invite the Examiner to contact the Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,
WAGNER, MURABITO & HAO LLP

Dated: ___8/9___, 2004

John P. Wagner, Jr.
Registration No. 35,398

Address:
WAGNER, MURABITO & HAO LLP
Two North Market Street
Third Floor
San Jose, California 95113

Telephone:
(408) 938-9060 Voice
(408) 938-9069 Facsimile